



Order Filed on August 18, 2021  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)  
SALDUTTI LAW GROUP  
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(856) 779-0300  
Counsel for Creditor Thomas J. Welsh, Jr.

In Re:

ROSA MARIA STYLES,

Debtor.

Case No.: 19-32881-ABA

Chapter: 11


Hrg Date: Aug. 17, 2021 at 10:30AM

Judge: Hon. Andrew B. Altenburg, Jr.

**CONSENT ORDER RESOLVING**  
**MOTION TO ENFORCE TERMS OF CONFIRMED PLAN**

The relief set forth on the following pages, numbered 2 and 3, is hereby ORDERED.

**DATED: August 18, 2021**

  
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Honorable Andrew B. Altenburg, Jr.  
United States Bankruptcy Court

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Debtor: Rosa Maria Styles

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Caption of Order: Consent Order Resolving Motion to Enforce Terms of Confirmed Plan

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Upon the motion of Thomas J. Welsh, Jr. ("Welsh"), by and through counsel, Saldutti Law Group, pursuant to 11 U.S.C. §§ 105(a) and 1142, to enforce the terms of the confirmed Chapter 11 plan ("Motion"); joinder having filed by CEBV, LLC ("CEBV"), by and through counsel; Debtor Rosa Maria Styles ("Debtor") having filed opposition; and the parties having reached a resolution of the Motion as it relates to the sale of real property located at 43 W. 12<sup>th</sup> St., Avalon, New Jersey ("Real Property"); now therefore,

It is on this day ORDERED:

1. Debtor, along with any friends, relatives, or other persons occupying the Real Property, shall vacate the Real Property on or before September 13, 2021.
2. Debtor shall remove all items on the attached Exhibit on or before September 13, 2021.
3. The sale of the Real Property, if and as approved by this Court in accordance with the Bankruptcy Code and the Federal Rules of Bankruptcy Procedure, shall close on or before September 15, 2021.
4. In the event Debtor and/or any other person fails to vacate the premises of the Real Property and/or remove personal property on or before September 13, 2021, as set forth herein, then Welsh may notify this Court on September 14, 2021, of Debtor's failure to comply by filing an emergency application to hold Debtor in contempt of this Order ("Contempt Application").
5. The Contempt Application shall be filed on the docket and served via electronic mail upon Anthony Sodono, Sari Placona, Jeffrey Sponder, Ernest Palmarella, and Michael Menkowitz before 9:00AM on September 14, 2021.
6. Debtor shall have until 12:00P.M. on September 14, 2021, to file a written objection to the Contempt Application, except that she shall have no defense to the Application other than that she has vacated the premises and removed her belongings as required by this Order, and no other requests for relief or representations shall be considered.
7. The Court will sign the proposed contempt order on September 14, 2021, after 12:00PM, provided Debtor has not vacated the premises and the proposed order conforms to the language set forth below.

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Debtor: Rosa Maria Styles

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8. By agreement of Debtor through counsel's signature on this Order, the proposed contempt order submitted with the Contempt Application ("Contempt Order") shall provide as follows, with alterations to the language as necessary depending upon whether the Order pertains to removal of individuals, property, or both, and shall include the attached list if removal of property is warranted:
  - a. That Debtor is in contempt of this Order by failing to vacate the premises and/or remove her belongings on or before September 13, 2021;
  - b. That this Court directs the U.S. Marshals, on or before September 15, 2021, to remove Debtor and any other individuals and/or remove any of the items in the attached list from the premises of the Real Property; and/or
  - c. That the U.S. Marshals shall not remove any items from the Real Property that are not provided for on the attached list.
9. In the event the sale of the Real Property is not approved by this Court or does not close on or before September 15, 2021, then Welsh may immediately list the Real Property for sheriff sale on September 16, 2021, and this Order shall serve as notice to the Cape May County Sheriff that there is no bankruptcy stay as to the Real Property and such sheriff sale may proceed.

/s/ Rebecca K. McDowell

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Counsel for Debtor

Exhibit

Debtor shall remove the following items from the Real Property on or before September 13, 2021:

- First Floor:
  - Nautical search light
  - Telescope
  - Oars
  - Icemaker
  - Surfboard
  - Avalon long picture
- Third Floor:
  - Painting above church pew
  - Nautical table and lamp
  - Paintings in the office/bedroom
- Garage:
  - Red buggy
  - All yacht equipment
- Second Floor:
  - Sewing machine
  - Ship
  - Farm sofa table
  - Lamp on farm table
  - Harpoons
  - Large Pop Pop next to fridge
  - Brookstone grill
  - Teak outdoor table
  - Propellers in propeller bedroom
  - Two (2) nautical blueprint pictures
  - Two (2) surfing pictures in shell bedroom
- Entire Home:
  - Clothing, shoes, and jewelry
  - Cosmetics and toiletries
  - Medications
  - Animals
  - Perishable food items
  - Toys
  - Linens